



THE CITY OF NEW YORK
LAW DEPARTMENT
 100 CHURCH STREET
 NEW YORK, N.Y. 10007

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February 26, 2008

SO ORDERED

VIA FAX

Honorable George B. Daniels
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007
 (212) 805-6737

The conference is rescheduled
 for April 24, 2008 at 9:30 a.m.

FEB 27 2008 *George B. Daniels*
HON. GEORGE B. DANIELS

Re: Andre Mullin, et al., v. City of New York, et al. 07 CV 4760 (GBD)

Dear Judge Daniels:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and attorney for defendants The City of New York, New York City Police Department and Police Officer Iscovici. I write with the consent of plaintiffs' counsel, Steven Epstein, Esq. and after discussion with Chambers to respectfully request: (1) an adjournment of the status conference scheduled for tomorrow, February 27, 2008 at 9:30 a.m.; (2) a ninety (90) day extension of time from April 21, 2008, to July 21, 2008 to complete discovery and a corresponding enlargement of the dates adopted in the Civil Case Management Plan dated June 7, 2007.

The complaint alleges, *inter alia*, that plaintiffs Andre Mullin and Gabriel Quiros were falsely arrested, imprisoned, was subjected to excessive force. In addition to the City of New York and New York City Police Department, plaintiffs also name Police Officer John Iscovici as a defendant. Issue has been joined and discovery has commenced. There remain several discovery issues outstanding. The undersigned received signed authorizations to release plaintiffs' medical records today but to date has not yet received signed releases for plaintiffs' criminal court records. Once these authorizations and releases are received by this office they will be processed and depositions will commence.

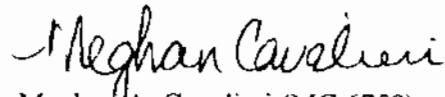
In view of the foregoing, it is respectfully requested that the Court grant the within requests:

- granting an adjournment of the status conference scheduled for tomorrow, February 27, 2008 at 9:30 a.m., to April 9, 2008, April 14, 2008 or a date amenable to the Court;

- granting defendants a ninety (90) day enlargement of time from April 21, 2008 to July 21, 2008 complete discovery;
- a corresponding enlargement of the deadline for dispositive motions to be filed from February 28, 2008 to July 28, 2008;
- extending the filing date of the Joint Pretrial Order from March 20, 2008 to August 18, 2008.

Thank you for your consideration in this regard.

Respectfully submitted,



Meghan A. Cavalieri (MC 6758)
Assistant Corporation Counsel
Special Federal Litigation Division

cc: VIA FAX and E-MAIL

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